

Defendants' Objections to Plaintiff's Trial Exhibits

No.		Exhibit	Objection
1.	1/22/21	Ortolano email to Board of Aldermen, Legal, Board of Assessors, "Attorney Leonard should be Fired"	Hearsay <i>See defendants' objection ¶8</i>
2.	10/26/23	Union Leader Article – Ortolano's First Amendment Award	Irrelevant; hearsay <i>See defendants' objection ¶13</i>
3.	10/26/23	First Amendment Award Booklet	Irrelevant; hearsay <i>See defendants' objection ¶13</i>
4.	10/26/23	Eagle Sculpture Award	Irrelevant; hearsay <i>See defendants' objection ¶13</i>
5.	9/12/18	Attest Board of Aldermen Meeting Minutes pgs 1, 13-14, 17 (Full Attest meeting Minutes for Judge McCafferty)	Hearsay; irrelevant <i>See defendants' objection ¶¶1, 3</i>
6.	10/10/18	Bolton email to Board on A Stroll Down Berkley St w Ortolano email to Mayor, Atty Bolton, etc.	
7.	11/13/19	Batch 1-6 Duhamel Emails received by Ortolano from Atty. Leonard Right-to-Know request #2019-3	Irrelevant <i>See defendants' objection ¶5</i>
8.	11/7/18	Ortolano email to Board of Aldermen cc Mayor Donchess – Mayor's Property Record Card	Irrelevant <i>See defendants' objection ¶3</i>
9.	11/27/18	Board of Aldermen Meeting Minutes pgs. 1-2, 7-12, 16 Mayor responds to Rockland Permit (Full Attest Meeting Minutes for Judge McCafferty)	Hearsay <i>See defendants' objection ¶1</i>
10.	11/28/18	Union Leader Article "Citizen Complaint prompts Assessing Audit in Nashua"	Irrelevant; hearsay <i>See defendants' objection ¶¶4, 5</i>

11.	12/11/18	Board of Aldermen Meeting Minutes pgs 1, 42-43, 47 Redacted (Full Attest Meeting Minutes for Judge McCafferty)	Hearsay <i>See defendants' objection ¶1</i>
12.	10/12/19	Ortolano RTK email to Leonard for "Donchess Timeline"	Irrelevant <i>See defendants' objection ¶3</i>
13.	10/18/19	LTR Leonard response to Ortolano for "Donchess Timeline" (RTK#2019-89)	Irrelevant <i>See defendants' objection ¶3</i>
14.	10/17/19	Ortolano RTK email to Leonard second try for "Donchess Timeline"	Irrelevant <i>See defendants' objection ¶3</i>
15.	10/24/19	LTR Leonard response for Donchess Timeline with Responsive Records (2019-89 & 97)	Irrelevant <i>See defendants' objection ¶3</i>
16.	Sep-19	Nashua Assessor Manual "Public Relations in the Assessor's Office"	
17.	7/13/19	Kleiner email to Leonard forwarding Ortolano email (7/12/2019)	
18.	7/19/19	LTR Leonard responds to Ortolano (RTK 2019-14)	
19.	8/23/19	Leonard email to Kleiner, Legal "Conversations Assessing 8 22 19"	
20.	6/19/19	BTLA Order and Hearing Notice August 6, 2019	Irrelevant <i>See defendants' objection ¶5</i>
21.	8/6/19	BTLA Hearing Ortolano Presentation "A Citizens Performance Audit of the Nashua Assessing Office"	Irrelevant <i>See defendants' objection ¶5</i>
22.	10/29/19	BTL Order for Reassessment	Irrelevant <i>See defendants' objection ¶5</i>
23.	9/5/19	LTR Leonard responds to Ortolano for Kleiner Assessing Office meeting Agendas	Litigation privilege; hearsay <i>See defendants' objection ¶2</i>
24.	9/15/19	Ortolano email to Leonard cc Donchess, BOA Right to Know Requests	Litigation privilege; hearsay <i>See defendants' objection ¶2</i>

25.	12/12/19	Kleiner email to Leonard residential sales report forwarding Ortolano email to Assessors (2019-122)	Litigation privilege; hearsay; irrelevant <i>See defendants' objection ¶¶2, 6</i>
26.	12/18/19	LTR Leonard responds to Ortolano (2019-122) Re: Board of Assessor Meeting	Litigation privilege; hearsay <i>See defendants' objection ¶2</i>
27.	3/9/21	Board of Alderman meeting – LO PC on Arrest 1, 42, 47 (Full Attest meeting Minutes for Judge McCafferty)	Hearsay <i>See defendants' objection ¶1</i>
28.	2020	DRA Sanctions on Assessors – Jon Duhamel, Greg Turgiss, Rob Tozier	Irrelevant <i>See defendants' objection ¶5</i>
29.	3/16/20	Nashua Telegraph Article “Celebrate Sunshine Week”	Irrelevant; hearsay <i>See defendants' objection ¶4</i>
30.	11/14/20	FB Post “Nashua’s Over-reach of the RKT law (Redacted)	Hearsay <i>See defendants' objection ¶8</i>
31.	11/14/20	FB Post “Something weird is happening...”	Hearsay <i>See defendants' objection ¶8</i>
32.	1/14/20	Ortolano email to Brown – Ortolano Abatement file	
33.	1/15/20	LTR Leonard email to Attorney Lehmann Re: Ortolano abatement file (RTK #130)	Litigation privilege; hearsay; irrelevant <i>See defendants' objection ¶2</i>
34.	1/15/20	Ortolano email to Mayor Re: Abatement File	
35.	1/15/21	City Public Notice for Access to Assessing Office during Covid	
36.	1/29/21	Ortolano Screenshots of City Hall Offices requiring Appointments	
37.	5/29/21	City Public Notice for Reopening Nashua City Hall	
38.	1/17/21	Ortolano email to Assesshelp/Chief Vincent Re: 2 Signed Abatement Applications	

39.	1/20/21	Ortolano email to Assesshelp/Chief Vincent Follow-up on Abatement Applications	
40.	1/20/21	Rick Vincent email to Ortolano re: 2 signed Abatement Applications	
41.	2/5/21	Vincent email to Ortolano 28 Baltimore Rd Application Stamped	
42.	2/5/21	Vincent email to Ortolano 18 Baltimore Rd Application Stamped	
43.	6/11/21	BTLA Decision on 41 Berkley St. 2018-2019 Abatement appeals	Irrelevant; litigation privilege <i>See defendants' objection ¶6</i>
44.	7/15/21	Board of Assessor Meeting Minutes pgs. 1, 8-10, 16 (Attest Full Board of Assessors Meetings Minutes)	Irrelevant; litigation privilege; hearsay <i>See defendants' objection ¶¶6, 7</i>
45.	3/24/21	Complaint – Claims A Misdemeanor	
46.	2/18/21	Arrest Warrant, Affidavit, and Notice of Intent to Seek Class A Misdemeanor	
47.	1/22/21	Call log/reports for Trespass at City Hall	
48.	2/18/21	Property taken at arrest 2/18/21	
49.	2/18/21	Bail and Bail Conditions	
50.	7/12/21	Disposition and Sentencing Form	
51.	1/24/21	Union Leader Article – “Woman Escorted out of City Hall by Police”	Irrelevant; hearsay <i>See defendants' objection ¶4</i>
52.	1/26/21	LTR Mike O'Connor to BOA/cc Mayor on “Woman Escorted Out by Police”	Irrelevant; hearsay <i>See defendants' objection ¶13</i>
53.	1/27/21	Union Leader Article – “City Hall no-trespass order put in place against Nashua Woman”	Irrelevant; hearsay <i>See defendants' objection ¶4</i>

54.	2/3/21	Union Leader Article – “Laurie Ortolano won’t stop taking on City Hall”	Irrelevant; hearsay <i>See defendants’ objection ¶4</i>
55.	2/22/21	Union Leader Article “Nashua Woman escorted from City Hall charged with Trespassing”	Irrelevant; hearsay <i>See defendants’ objection ¶4</i>
56.	3/15/21	Police Dept response to Colquhoun’s RTK request for Service calls for trespass to City Hall 1/1/2014 to 1/31/2021	Motion in <i>limine</i> – Doc. No. 138 <i>See defendants’ objection ¶9</i>
57.	4/26/21	Ortolano email to Attorney Goulden Re: Contract and Appearance	Irrelevant; hearsay
58.	6/24/21	Assent/GRANTED Motion to Amend Bail Conditions	
59.	7/23/21	Kenney email to Bolton – “State v. Ortolano”	Irrelevant; hearsay <i>See objection ¶11</i>
60.	8/19/21	Kenney email to Bolton – Amend Conditions	Irrelevant; hearsay <i>See objection ¶11</i>
61.	8/18/21	Kenney email to Bolton – “Phone Tag”	Irrelevant; hearsay <i>See objection ¶11</i>
62.	7/7/22	Conditional Discharge Order	
63.	1/31/23	Court Order – City Motion to Intervene DENIED	Irrelevant; hearsay <i>See objection ¶11</i>
64.	7/5/21	Ortolano email to Leonard for Training Manual	Litigation privilege; hearsay <i>See defendants’ objection ¶2</i>
65.	7/5/21	Attorney Bolton email to Attorney Lehmann on Training Manual	Litigation privilege; hearsay <i>See defendants’ objection ¶2</i>
66.	2/2/22	Lovering email to Ortolano cc Legal Dept. “Your Visit to the Clerk’s Office on January 31, 2022”	Irrelevant; hearsay
67.	5/5/22	Legal Clerk Perry to Ortolano on Phone Message	Irrelevant; hearsay

68.	8/1/22	Police Report 22-43246 Bolton Attempted Arrest on Ortolano 7-22-22	Inadmissible per motion <i>in limine</i> (Doc. No. 136) <i>See defendants' objection ¶12</i>
69.	7/28/22	Ortolano email to Kleiner-Ortolano attending Assessor Meeting	Inadmissible per motion <i>in limine</i> (Doc. No. 136) <i>See defendants' objection ¶12</i>
70.	7/28/22	Attorney Bolton email to Ortolano & Kleiner	Inadmissible per motion <i>in limine</i> (Doc. No. 136) <i>See defendants' objection ¶12</i>
71.	10/25/22	Attest Board of Aldermen Meeting Minutes pgs 1, 13, 17 (Full Attest Meeting Minutes for Judge McCafferty)	Irrelevant; hearsay <i>See defendants' objection ¶1</i>
72.	2022	Photograph 3 rd Floor Legal Office Hallway	
73.	2022	Photograph 3 rd Floor Legal Office Door w Notice	
73-a.	2022	Photograph of Door Sign – “Door Open Frequently”	
74.	5/10/24	Photograph 3 rd Floor Hallway to Auditorium	
74-a.	5/10/23	Photograph Legal Office “By Appointment Only”	
74-b.	5/10/23	Photograph Legal Office “Authorized Personnel Only”	
75.	5/10/24	Photograph 3 rd Floor view to IT Office	
76.	5/10/24	Photograph 3 rd Floor view to stairwell	
77.	5/10/24	Video of 3 rd floor hallways	Irrelevant; hearsay
78.	11/30/22	Ortolano RTK Request for Bolton Police Records – 10-4-2012 Incident 12-83358 (P)	Irrelevant; hearsay <i>See defendants' objection ¶2</i>

79.	12/11/18	A/V Board of Aldermen Meeting pt1 Mike Ortolano Public Comment	Cumulative <i>See defendants' objection ¶10</i>
80.	6/27/19	A/V Board of Assessor Meeting CW	Hearsay; irrelevant <i>See defendants' objection ¶10</i>
81.	8/13/19	A/V Board of Aldermen Meeting Attorney Bolton	Hearsay; irrelevant <i>See defendants' objection ¶10</i>
82.	2/2/20	A/V Board of Assessors Meeting LO Comments	Hearsay; irrelevant <i>See defendants' objection ¶10</i>
83.	3/9/21	A/V Board of Aldermen (noted as Assessors on plf's list) Meeting Ortolano Public Comments	Cumulative <i>See defendants' objection ¶10</i>
84.	10/25/22	A/V Board of Aldermen Meeting KB Comments	Cumulative <i>See defendants' objection ¶10</i>
85.	1/22/21	20210122_091659_Video CH-Floor1-Exit lo enters building	
85-a.	1/22/21	20210122_091705_Video CH-Floor1-W LO at greeter4	
85-b.	1/22/21	20210122_091748_Video CH-Floor1-Lo at 1st fl stairwell E	
85-c.	1/22/21	20210122_091841_Video CH-Floor3 Ortolano on 3rd floor	
85-d.	1/22/21	20210122_093831_Video CH LO with police leaving-Floor3	
85-e.	1/22/21	20210122_094525_Video CH-RearParking	
86.	4/29/25	June 5, 2025 Status Conference Memorandum	Litigation privilege; hearsay <i>See defendants' objection ¶2</i>

87.	5/9/25	City Objection to Status Conference Memorandum	Litigation privilege; hearsay <i>See</i> defendants' objection ¶2
-----	--------	---	--